

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE, WSBN 32245
Associate General Counsel
Office of Program Litigation, Office 7
Social Security Administration
MARGARET LEHRKIND, CASB 317414
Special Assistant United States Attorney
6401 Security Boulevard
Baltimore, Maryland 21235
Telephone: (510) 970-4829
E-Mail: Margaret.Lehrkind@ssa.gov
Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

GARY SCOTT BROWN,)	Case No.: 1:23-cv-01168-ADA-GSA
)	
Plaintiff,)	STIPULATION AND ORDER FOR AN
)	EXTENSION OF TIME
vs.)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Opening Brief be extended thirty (30) days from December 15, 2023, up to and including January 14, 2024. This is Defendant's first request for an extension to file a brief in this action and there is good cause to grant this request.

Defendant's brief is due December 15, 2023. Our office has hired several new attorneys that started in the beginning of September 2023. Defendant's counsel is assigned to mentor one of the new attorneys and review her briefing, which requires a significant amount of time and training. This case is being used as a training case. An additional 30 days would provide

Defendant's counsel with sufficient time to review the new attorney's work and properly respond to Plaintiff's opening brief.

For these reasons, this Court should grant Defendant's unopposed request and extend the deadlines to file a response to Plaintiff's opening brief and the optional reply brief.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: November 29, 2023

/s/ Jonathan Omar Pena

(*as authorized via e-mail on November 29, 2023)

JONATHAN OMAR PENA

Attorney for Plaintiff

Dated: November 29, 2023

PHILLIP A. TALBERT

United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

By: /s/ Margaret Lehrkind

MARGARET LEHRKIND

Special Assistant U.S. Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including January 21, 2024, to respond to Plaintiff's Motion for Summary Judgment.

IT IS SO ORDERED.

Dated: November 29, 2023

/s/ Gary S. Austin

UNITED STATES MAGISTRATE JUDGE